Attachment # 12
12-16-01

State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT
32 E. Hanover St., CN 028, Trenton, N.J. 08625

DR. MARWAN M. SADAT, P.E.
DIRECTOR

LINO F. PEREIRA, P.E.
DEPUTY DIRECTOR

22 MAY 1985

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

C. L. Orman, Refinery Manager
Perth Amboy Refinery
Chevron USA, Inc.
1200 State Street
Perth Amboy, New Jersey 08801

RE: Call-In of Complete New Jersey Hazardous Waste Facility Permit Application for Chevron USA, Inc., Perth Amboy Facility, EPA I.D. No. NJD 081 982 902

Dear Mr. Orman:

By letter dated September 26, 1984, the NJDEP (Department) requested your facility to submit a complete New Jersey Hazardous Waste Facility Permit Application (Part B) for the referenced facility within six months of the date of that letter.

The basis for the Part B call-in was the fact that Chevron filed with the USEPA on November 12, 1980 for the following hazardous waste activities which were considered to be RCRA regulated:

a)	S01	Containerized/drummed storage	600 gallons
b)	S02	Tank Storage	1,680,000 gallons
c)	S04	Impoundment Storage	9,000,000 gallons
d)	T04	Unspecified Treatment	4,320,000 gal/day
e)	D83	Impoundment Disposal	9,000,000 gallons

Since the date of the Part B call-in, and as a result of information obtained by DEP personnel during:

a) Site-inspection by Division of Waste Management and Division of Water Resources representatives

b) Meetings and discussions held at the site and in the Department offices among Chevron and NJDEP people (DWM and DWR).

c) Correspondence between the Company and the Department, including revisions of original Part A.

The following determinations were made regarding hazardous waste activities conducted by the facility and permitting requirements under RCRA and New Jersey State Regulations:

1. S01 - [redacted] from permitting since the company operates in compliance with [redacted]

2. S04 and T04 and D83 activities related to surface impoundments and land farm treatment area are subject to DWR regulations, and will not be Part B permitted under RCRA. Chevron USA has submitted closure plans for these facilities to DWR for review toward obtaining approval for implementation.

3. T01 - tank treatment hazardous waste activity - was filed for in a revised Part A submitted on 1/12/84. However, this pertained to an IAF recycling process that is exempt from permitting because of On-Site Recycling Exemption that became effective on January 17, 1984; and was, therefore, subsequently deleted in a later Part A amendment.

4. S02 - tank storage activity - related to "sour water" handling which is part of a "totally enclosed system" that is exempt from permitting under RCRA. Additionally, S02 also includes tank storage of spent strong caustic that is used to scrub fuel gasses.

The reasons for exemption of S01, S04, T04, T01 and D83 hazardous waste activities from RCRA permitting (Part B filing) requirements are explained above. Exemption of S02 activity that was originally filed for, from permitting requirements is subject to certain considerations. The S02 activity can be applied to IAF Float Processing, Sour Water Treating System, and waste strong caustic storage. The status of exemptions for these three processes from RCRA permitting requirements are given below, and pertinent limitations are delineated.

A. <u>IAF Float Processing</u>

IAF float is generated in the effluent treatment plant. It is collected and transported by truck to Tank V-723. In this vessel, the material is diluted in 1:1 ratio with No. 2 fuel oil; thence fed (pumped) to No. 5 crude (atmospheric) column for recycling. It becomes incorporated into the product.

During periods of plant shutdown, IAF Float may also be stored in Tanks numbered 733, 734, 735.

Capacity of the V-723 is 34,000 gallons. Combined capacity of tanks 733, 734, 735 is 90,000 gallons.

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Limitation

Chevron must comply with the On-Site Recycling (Permitting) Exemption. IAF Float may not be stored in tank V-723 or in any of the other three tanks mentioned above., for more than 90 days before the tank is pumped out to the No. 5 unit crude column C-501. Also, annual reporting is required as specified at N.J.A.C. 7:26-12.1(b)9ii. Chevron is presently in compliance, therefore, a permit will not be required for this process.

B. Sour Water Treating System

Sour Water is generated by condensation of steam from the top of the columns of No. 5 crude unit. It contains absorbed H_2S gas. Since the remainder of the plant (refinery) is not operating at this time, the only source of sour water is No. 5 crude unit. The limited amount of sour water produced is collected in V-505 break tank. It is pumped together with the crude to the desalter unit where fresh water is also added. From the desalter unit, the water discharge is sent to the effluent treatment plant.

Hence, there is presently no storage of sour water in tanks; and the entire sulphur recovery system is out of service. A permit is not required for the current operation. If the sulphur recovery unit is put back in service, the Bureau shall be notified and provided with verification that the process is still totally enclosed.

C. Strong Caustic Used to Scrub Fuel Gasses

Strong caustic is used to scrub fuel gasses which emanate from the No. 5 unit. It is understood that this material is handled in the following manner:

a) Strong caustic is delivered to the facility by tankwagon and is pumped directly into the scrubber vessel.

b) The strong caustic in the scrubber absorbs sulphur contained in the fuel gas discharges; and in the process, retains the sulfides in the form of NA_2S and NaHS compounds.

c) The saturated (spent) caustic solution is removed from the scrubber by being pumped out to a tank.

d) From the tank(s), the material is pumped to railroad tank cars for delivery to a paper manufacturer located out of state (in Maine) for direct consumption in a paper making process.

The spent caustic scrubber solution is considered a hazardous waste as defined and delineated in N.J.A.C. 7:26-1.6. Also, it displays the Characteristics of Corrosivity and Reactivity as defined in N.J.A.C. 7:26-8.10 and N.J.A.C. 7:26-8.11, respectively. Therefore, it must be manifested and shipped off-site to an authorized facility.

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Presently, New Jersey Hazardous Management Regulations require permitting for all tanks in which hazardous waste is stored unless exemption is granted for certain specified reasons (e.g., recycling and totally enclosed system). On the other hand, containers that are used to store hazardous waste can be exempt from permitting if they are managed in accordance with N.J.A.C. 7:26-9.3, which includes disposal of containerized waste off-site within 90 days of date accumulation began.

In order for the Department to make a determination as to complete permitting requirements for your facility, including the waste, caustic handling (storage) vessels, it will be necessary for Chevron to submit more information about the caustic system. You should provide the following information:

1. Identify the tank or tanks in which the spent (waste) caustic is stored.
   a) State number of tanks involved
   b) Name or number designation(s) of equipment
   c) Indicate capacity of each vessel
   d) Indicate how long waste is stored in the tank(s) before being pumped into the rail cars.

2. How many railroad tank cars are used for collection of waste caustic?

   a) State capacity of railroad tank car.
   b) Indicate how long waste caustic is held in the railcars before shipment off-site?

The information requested above concerning waste caustic handling at your facility should be submitted to this Bureau within 10 days of the date of this letter. Conclusions as to the necessity for Chevron to submit a Part B Permit application will also be dependent on your response to this letter.

You should be advised that proposals are being formulated, for possible adoption, that may (in the future) allow a permitting exemption for storage of waste in tanks for 90 days or less under certain specified conditions. This situation will be taken into account while consideration is being given to your current facility status and related submittal requirements.

If you have any questions, please contact Mr. Ben Esterman of my staff.

Very truly yours,

Frank Coolick

Frank Coolick, Chief
Bureau of Hazardous Waste Engineering

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Division of Waste Mgt.